IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

RONALD L. RICHARDSON,

Plaintiff,

v. * Case No. 08-C-12-000139

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

* * * * * * * * * * * *

NOTICE OF REMOVAL

Equifax Information Services LLC ("Equifax"), Defendant in the above-captioned action, hereby files this Notice of Removal of this action from the Circuit Court of Maryland for Charles County, wherein it is now pending as Case No. 08-C-12-000139, to the United States District Court for the District of Maryland, embracing the place where this action is pending. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, Equifax shows this Court as follows:

- 1. An action was commenced against Equifax in the Circuit Court of Maryland for Charles County, entitled *Ronald L. Richardson v. Equifax Information Services LLC*, Case No. 08-C-12-000139. Equifax was served on January 19, 2012.
- 2. To the best of the Equifax's knowledge, no other pleadings have been filed by any other party in this action.
- 3. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the constitution, laws or treaties of the United States;

specifically 15 U.S.C. §§ 1681, et seq., otherwise known as the Fair Credit Reporting Act ("FCRA"), as follows:

- 4. Removal is timely because 30 days have not elapsed since Equifax first received notice of Plaintiff's action setting forth the grounds for his action and his claims for relief.
- 5. A copy of all process, pleadings, and orders served upon the Defendant in the State Court Action is attached hereto as Exhibit A.
- 6. The above action is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1441 because Plaintiff's Complaint expressly alleges violations of the federal Fair Credit Reporting Act, 15 U.S.C. §§ 1681, et seq. ("FCRA"). *See* Exhibit A.
- 7. Pursuant to 15 U.S.C. § 1681p and 28 U.S.C. § 1331, this Court has original jurisdiction over FCRA claims without regard to the amount in controversy.
- 8. The State Court in which this action was commenced is within this Court's district and division.
- 9. Promptly after the filing of this Notice of Removal, Defendant shall provide notice of the removal to Plaintiff in the State Court action and to the Clerk of the Court in the State Court action, as requires by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant prays that the above-described action now pending in the Circuit Court of Maryland for Charles County be removed to this Court.

Respectfully submitted,

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